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Edward Goldman, James Ketsaa and  
Christopher Klemp*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DANIEL M. BURGESS, an individual;  
ANTHONY RUSSO, an individual,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT, a  
political subdivision; EDWARD GOLDMAN,  
an individual; JAMES KETSAA, an  
individual; CHRISTOPHER KLEMP, an  
individual,

Defendants.

Case No. 2:17-cv-00805-GMN-VCF

**STIPULATION FOR EXTENSION OF  
TIME TO FILE DISCOVERY  
PLAN/SCHEDULING ORDER**

**(Third Request)**

It is hereby **STIPULATED AND AGREED** between Plaintiff Daniel M. Burgess ("Burgess") and Defendants, by and through their undersigned counsel, that the parties will have additional time to submit their proposed discovery plan up to and including **September 25, 2017**. This extension is requested as the parties are currently attempting to finalize a settlement agreement, and wish to avoid incurring additional costs and fees while they actively pursue settlement. This Court has provided the parties until September 25, 2017 to file a stipulation dismissing the action. *See* ECF No. 39. This extension allows the parties the same timeframe in which to file the discovery plan/scheduling order. The proposed discovery plan/scheduling order is currently due

1 August 30, 2017. This is the third request for an extension of time to file the proposed discovery  
2 plan/scheduling order, as settlement discussions have been ongoing.

3 The above-stipulated extension does not affect ongoing proceedings in this case involving  
4 the other plaintiff, Anthony Russo.

5  
6 DATED this 29th day of August, 2017.

DATED this 29th day of August, 2017.

7 GREENBERG TRAURIG, LLP

MAIER GUTIERREZ & ASSOCIATES

8  
9 /s/ Kara B. Hendricks

/s/ Jason R. Maier

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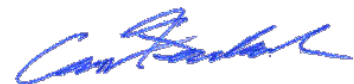
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16 *Counsel for Defendants*

*Counsel for Plaintiff Daniel M. Burgess*

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**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

Dated: August 31, 2017